

REMARKS

Claims 1-38 are pending in the application and stand rejected. By the above amendment, claims 1, 3, 5-12, 15, 16, 21-23, 25-30, 34, 36 and 38 are amended and claims 2, 24 and 35 are canceled without prejudice. Reconsideration of the claim rejections is respectfully requested based on the above amendments and following remarks.

In the Final Office Action, claims 1-38 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,501,832 to Saylor et al. In addition, claim 1 stands rejected under 35 U.S.C. 102(e) as being unpatentable over U.S. Patent No. 6,430,624 to Jamtgaard.

Applicants respectfully submit that at the very least, Saylor does not anticipate the inventions of claims 1, 23 or 34. For instance, with regard to claims 1, 23 and 34, Saylor does not disclose or suggest, e.g., *a conversational portal that serves or presents pages to a client/access device in at least one format that is compatible with one or more modalities of the client/access device, wherein the at least one format comprises a multi-modal format that can be rendered in two or more synchronized modalities*, as essentially claimed.

As previously explained, Saylor explicitly discloses a voice-based system for accessing voice pages in a VNAP (voice network access provider) system, which includes a voice browser that is capable of providing an audio-based user interface and interaction in one (audio) modality. This is unquestionably clear based on the teachings of Saylor. The voice browser does not, and cannot, present a content page having *a multi-modal format that can be rendered in two or more synchronized modalities*.

Moreover, with respect to claim 1, the Examiner's rejection of claim 1 based on Jamtgaard appears to be erroneous because the rejection does not directly address the elements of

claim 1. Once again, the Applicant requests that this rejection be clarified to address the exact claim language of claim 1.

In any event, Jamtgaard does not disclose or suggest, e.g., *a conversational portal that serves or presents pages to a client/access device in at least one format that is compatible with one or more modalities of the client/access device, wherein the at least one format comprises a multi-modal format that can be rendered in two or more synchronized modalities*, as essentially claimed in claim 1. Even if the translation server (12) of Jamtgaard may be construed as a transcoder (28), Jamtgaard does not disclose *a conversational browser* as contemplated by the invention, much less a conversational browser that is executable to provide a multi-modal user interface for a conversational portal system or present or serve multi-modal formatted pages that can be rendered in multiple synchronized modalities.

Therefore, for at least the above reasons, claims 1, 23 and 34 are patentable and non-obvious over Saylor and Jamtgaard. Furthermore, all pending claims that depend from claims 1, 23 and 34 are believed to be patentable over the cited combination at least by virtue of their dependence from respective base claims 1, 23 and 34.

Accordingly, withdrawal of the claim rejections is requested.

Respectfully submitted,



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